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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$10,979.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:22-MC-00046-TLN-AC

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Angelina  
18 Perez (“claimant”), by and through their respective counsel, as follows:

19 1. On November 8, 2021, the claimant filed a claim in the administrative forfeiture proceedings  
20 with the Federal Bureau of Investigation with respect to the Approximately \$10,979.00 in U.S. Currency  
21 (hereafter “defendant currency”), which was seized on August 10, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant  
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
That deadline was February 6, 2022.

4. By Stipulation and Order filed February 2, 2022, the parties stipulated to extend to April 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to May 6, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to May 6, 2022.

Dated: 4/7/22

PHILLIP A. TALBERT  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

Dated: 4/7/22

/s Kimberly Hunt  
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Attorney for potential claimant  
Angelina Perez

(Signature authorized by email)

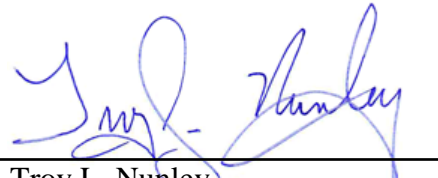
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**IT IS SO ORDERED.**

Dated: April 7, 2022



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Troy L. Nunley  
United States District Judge